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Attorneys for Defendants
Advent Product Development, Inc.,
Denice Thurlow, and Alphonso Eiland

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

MATTHEW WATERS, individually and on
behalf of other members of the general
public similarly situated,

Plaintiff,

v.

ADVENT PRODUCT DEVELOPMENT,
INC., a South Carolina Corporation,
DENICE THURLOW, ALPHONSO EILAND,
and DOES 1 through 50, inclusive,

Defendants.

Civil Action No.: 07-cv-2089 (BTM) (LSP)

Document electronically filed.

**DEFENDANTS' NOTICE OF MOTION
FOR LEAVE TO FILE AN AMENDED
NOTICE OF REMOVAL**

**Motion Date: January 18, 2008
at 11:00 a.m.
(Per Chamber's No Oral Argument)**

PLEASE TAKE NOTICE that on January 18, 2008, at 11:00 a.m. or as soon thereafter as counsel may be heard, Blanchard, Krasner & French for Defendants Advent Product Development, Inc., Denice Thurlow, and Alphonso Eiland, shall move before the United States District Court for the Southern District of California for the

entry of an Order granting Defendants' leave to file an amended notice of removal pursuant to 28 U.S.C. § 1653.

PLEASE TAKE FURTHER NOTICE that counsel for the moving party shall rely upon the accompanying Memorandum of Points and Authorities in Support of Defendants' Motion for Leave to Amend and the Declaration of Carrie A. Longstaff, Esq. as well as the exhibits thereto, and all other pleadings and memoranda on file in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that counsel for the moving party requests oral argument.

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*Attorneys for Defendants
Advent Product Development, Inc.,
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Dated: December 14, 2007
La Jolla, California

s/ A. Kipp Williams
A. Kipp Williams

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